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# MEMO ENDORSED

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September 3, 2010

**VIA PDF EMAIL**

[sullivannysdchambers@nysd.uscourts.gov](mailto:sullivannysdchambers@nysd.uscourts.gov)

The Honorable Richard Sullivan  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDS SDNY  
DOCUMENT  
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Re: *Federal Insurance Co. v. Estate of Irving Gould, et al.,*  
Case 10-Civ.-1160 (RJS)

Dear Judge Sullivan:

We are counsel to third-party defendant Travelers Casualty and Surety Company of America ("Travelers") in the above-referenced matter. On August 18, 2010 Travelers was served with a third-party complaint in the case. Travelers' response, therefore, is currently due on September 8, 2010.

The third-party complaint seeks coverage under a 16-year old, high excess layer, D&O insurance policy. Travelers is still in process of locating the relevant files. Accordingly, we write seeking a brief adjournment of Travelers' time to answer, move or otherwise respond to the third-party complaint to and including September 22, 2010. There have been no previous requests for such an adjournment and I am authorized to say that counsel for the defendants-third-party plaintiffs consent to this request.

Thank you for your consideration of this matter.

Respectfully submitted,

James Sandnes

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Joseph G. Finnerty III, Esq. ([joseph.finnerty@dlapiper.com](mailto:joseph.finnerty@dlapiper.com))

4832-4467-3031

SO ORDERED  
Dated:

RICHARD J. SULLIVAN  
U.S.D.J.

9/7/10